



ONE RIVERFRONT PLAZA
1037 Raymond Blvd., 6th Floor
Newark, NJ 07102
T: 973.757.1100
F: 973.757.1090
WALSH.LAW

Liza M. Walsh
Direct Dial: (973) 757-1101
lwalsh@walsh.law

January 17, 2019

VIA ECF AND FEDERAL EXPRESS

The Honorable James B. Clark, III, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: *In re Tropicana Orange Juice Marketing & Sales Practices Litigation, MDL 2353*
Master Docket No. 2:11-cv-07382 (WJM) (JBC)**

Dear Judge Clark:

This firm, together with Gibson, Dunn & Crutcher LLP, represents Defendant Tropicana Products, Inc. ("Tropicana") in connection with the above-referenced matter. We write jointly with Plaintiff Angelena Lewis concerning the sealing deadlines and procedures set forth in L. Civ. R. 5.3 as they apply to this matter and specifically to the parties' anticipated submissions in connection with Angelena Lewis's Renewed Motion for Class Certification filed October 19, 2018 (DE No. 320) (the "Renewed Motion").

It is anticipated that the Renewed Motion will contain confidential materials of the Plaintiffs, Tropicana, and non-parties. The parties have conferred and, in order to streamline the process and avoid inefficiencies, respectfully request that they be permitted to file an omnibus joint motion to seal along with the redacted versions of the parties' filings thirty (30) days after the completion of all briefing on the Renewed Motion. This proposed process is consistent with the process this Court approved for sealing confidential material in the connection with prior class certification briefing. See Order, June 26, 2017 (DE No. 275).

If this proposal is acceptable, the parties respectfully request that Your Honor "So Order" this letter and place it on the docket.

We thank the Court for its kind attention to this matter and are available should the Court have any questions or need anything further.

Hon. James B. Clark, III, U.S.M.J.
January 17, 2019
Page 2

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF and E-mail)

SO ORDERED:

This 28th day of January, 2019



Hon. James B. Clark, III, U.S.M.J.